

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SAFETY-KLEEN SYSTEMS, INC.,)	CIVIL ACTION NO. CV-02-03565
)	
Plaintiff,)	
)	JURY TRIAL DEMANDED
v.)	
)	
DON R. PENNELL,)	
)	
Defendant.)	

DEFENDANT PENNELL'S RULE 26(a)(1) DISCLOSURES

In accordance with Federal Rule of Civil Procedure 26(a)(1), defendant Don R. Pennell ("Pennell") hereby provides the following information to plaintiff Safety-Kleen Systems, Inc. ("Safety-Kleen"):

A. The following individuals are likely to have discoverable information that Pennell may use to support his claims or defenses: Don Pennell, Len Venezia, and Frank Osbourne have knowledge of Pennell's work at Safety-Kleen's Malvern, PA branch. Don Pennell, Mellisa Sharp, Dean Lewis, John O'Neill, and Paul Fivelson have knowledge of the severance payment issues raised in the complaint. Don Pennell, Len Venezia, and Paul Reddington have knowledge of Pennell's work for HCC.

B. Pennell and/or his attorneys have possession, custody, or control of the following documents that he may use to support his claims or defenses: (1) documents related

to the severance payment issues raised in the complaint; (2) documents related to Pennell's employment with Safety-Kleen; and (3) documents related to Pennell's employment with HCC.

C. Pennell has asserted no claim for damages in this case.

D. Pennell has no insurance agreement that may satisfy any judgment in this case.

Respectfully submitted,

By: _____

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ATTORNEYS FOR DEFENDANT
DON R. PENNELL

Dated: September 17, 2002

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Defendant Pennell's Rule 26(a)(1) Disclosures has been furnished by overnight delivery to plaintiff's counsel as follows:

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this 17th day of September, 2002.

Sherry A. Swirsky